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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

|   |   |                                 |
|---|---|---------------------------------|
| WESLEY RENE BEKKER EVANS,               | ) | Case No.: 2:22-cv-00506-AC (SS) |
| Plaintiff,                              | ) | STIPULATION FOR AN EXTENSION OF |
| vs.                                     | ) | TIME; <del>PROPOSED</del> ORDER |
| KILOLO KIJAKAZI,                        | ) |                                 |
| Acting Commissioner of Social Security, | ) |                                 |
| Defendant.                              | ) |                                 |

With the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 26, 2022, up to and including October 26, 2022. This is the parties' first request for an extension. The Court requires good cause for modification of the briefing schedule (Dkt. 7 at 2). Defendant respectfully requests that the Court find good cause for the following reasons.

Plaintiff filed her brief on August 12, 2022 (Dkt. 11). The undersigned counsel for Defendant was on paternity leave at that time and was only reassigned this matter for the

Commissioner on September 8, 2022 (Dkt. 12). Along with this reassignment, the undersigned counsel for Defendant has been responsible for preparing the Commissioner's merits response in three other district court cases, negotiating and filing stipulations for attorneys' fees under the Equal Access to Justice Act in two district court cases, and reviewing applications as part of the Office of the General Counsel's ongoing recruitment efforts. The undersigned counsel for Defendant thus requires this extension of time to become fully acquainted with the instant case and sufficiently assess the defensibility of the Commissioner's final decision at issue here.

This request is made in good faith and with no intention to unduly delay the proceedings, and the undersigned counsel anticipate that no further extensions will be necessary. The parties further stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended accordingly.

Respectfully submitted,

Date: September 22, 2022

LAW OFFICES OF FRANCESCO BENAVIDES

By: /s/ Asim H. Modi for Francesco P. Benavides\*  
FRANCESCO P. BENAVIDES  
\*Authorized by email on September 22, 2022  
Attorneys for Plaintiff

Date: September 22, 2022


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By: /s/ Asim H. Modi  
ASIM H. MODI  
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**PROPOSED ORDER**

Pursuant to the parties' Stipulation, and for good cause shown, IT IS SO ORDERED that Defendant shall have an extension of 30 days, to October 26, 2022, to file the Commissioner's responsive brief.

Dated: September 26, 2022

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE